

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No. 23-01092 (MBK)

APPLICATION FOR ORDER SHORTENING TIME

TO: THE HONORABLE MICHAEL B. KAPLAN
CHIEF UNITED STATES BANKRUPTCY JUDGE

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

The above-captioned debtor (the “Debtor”), by and through its undersigned counsel, requests that the time period to notice a hearing on the *Debtor’s Motion for a Bridge Order Confirming the Automatic Stay Applies to Certain Actions Asserted Against Affiliates or Temporarily Extending the Stay and Preliminary Injunction to Such Actions Pending a Final Hearing on the Requested Relief* (the “Motion”)² as required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. A shortened hearing time is requested because: The Debtor anticipates that the Superior Court of New Jersey, Middlesex County, may imminently issue an order requiring the commencement of discovery in a matter that is subject to the automatic stay of section 362(a)(3) of the Bankruptcy Code. That discovery includes the potential apex depositions of senior executives of Kenvue Inc. (“Kenvue”) before the scheduled June 13, 2023, hearing on extension of the existing preliminary injunction. The depositions have been sought in connection with lawsuits by talc claimants asserting principally successor liability claims against Kenvue and Janssen Pharmaceuticals, Inc., among others, in an effort to avoid the scope of the automatic stay and preliminary injunction in effect in the Debtor’s chapter 11 case. But such successor liability claims are property of the Debtor’s estate and are therefore automatically stayed by operation of section 362(a)(3).

Accordingly, the Debtor respectfully submits that application of the automatic stay is clear, and given the imminent commencement of burdensome depositions and other discovery, it is necessary and appropriate for the Court to consider the Motion on shortened notice.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

2. State the hearing dates requested: The Debtor respectfully requests that the Court hear the Motion on June 2, 2023, or on a date and time which is most convenient for the Court.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).
The applicant requests entry of the proposed order shortening time.

Dated: May 31, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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